



Oregon

John A. Kitzhaber, M.D., Governor

Department of Environmental Quality

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August 28, 2001

Matt Cusma
Schnitzer Steel Industries
P.O. Box 10047
Portland, Oregon 97296-0047

RE: Black Sand Removal
Crawford Street Corporation Site
8424 and 8524 N. Crawford Street, Portland, Oregon

Dear Mr. Cusma:

Thank you for submitting the Conceptual Plan (attached) for removal of the black sand contamination documented as part of the Expanded Preliminary Assessment (XPA) of the above-referenced site. Elevated levels of polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls, and chromium, lead, and zinc were observed in the black sand, and are considered hazardous substances per ORS 465.200. Black sand delineated on the beach and the "bluff (top of bank)" is susceptible to erosion into the Willamette River or may be submerged during higher water levels than currently exist.

Based on contaminant concentrations in the black sand, the Department of Environmental Quality (DEQ) has determined that contaminant migration to the Willamette River from the black sand on the subject site may pose a threat to human health and the environment and warrants removal action measures (i.e., source control) under OAR 340-122-070. As a result, DEQ requires that Crawford Street Corporation take necessary black sand removal actions as described in the conceptual plan to mitigate the unacceptable risk.

Please call me if you have questions.

Sincerely,

Tom Gainer, P.E.
Project Manager
Voluntary Cleanup/Portland Harbor

Attachment

USEPA SF



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DEQ-EX-1